

DIEMER & WEI, LLP

Kathryn S. Diemer (#133977)
100 West San Fernando Street, Suite 555
San Jose, CA 95113
Telephone: 408-971-6270
Facsimile: 408-971-6271
Email: kdiemer@diemerwei.com

WILLKIE FARR & GALLAGHER LLP

Matthew A. Feldman (*pro hac vice*)
Joseph G. Minias (*pro hac vice*)
Benjamin P. McCallen (*pro hac vice*)
Daniel I. Forman (*pro hac vice*)
787 Seventh Avenue
New York, NY 10019-6099
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
Email: mfeldman@willkie.com
jminias@willkie.com
dforman@willkie.com

Counsel for Ad Hoc Group of Subrogation Claim Holders

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN BARBARA
ZELMER AND ROBERT ZELMER AND AD
HOC GROUP OF SUBROGATION CLAIM
HOLDERS EXTENDING TIME TO
RESPOND TO BARBRA ZELMER AND
ROBERT ZELMER'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

Re: Dkt. No. 2183

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by Barbara Zelmer and Robert Zelmer (collectively, the “**Zelmers**”), on the one
3 hand, and the Ad Hoc Group of Subrogation Claim Holders (the “**Ad Hoc Subrogation**
4 **Group**”), on the other hand. The Debtors and the Ad Hoc Subrogation Group are referred to in
5 this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.”
6 The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On May 22, 2019, the Zelmers filed their motion for relief from the automatic
9 stay [Dkt. No. 2183] (the “**Lift Stay Motion**”), which is set for a hearing before the Court at
10 9:30 a.m. on June 25, 2019. The notice of hearing for relief from stay [Dkt. No. 2185] (the
11 “**Notice**”) states that any response or objection is to be “filed or received no later than (14) days
12 after services of the Motion at 4:00 p.m.”

13 B. Paragraph 27 of the *Second Amended Order Implementing Certain Notice and*
14 *Case Management Procedures* [Dkt. No. 1996] provides, “Unless otherwise ordered by the
15 Court, the objection deadline for Debtors and the two official creditors’ committees with respect
16 to [any motion to lift the automatic stay] shall be 4:00 p.m. five (5) days prior to the scheduled
17 hearing.”

18 C. Counsel for the Zelmers and counsel for the Ad Hoc Subrogation Group have
19 agreed that the time for the Ad Hoc Subrogation Group to respond to the Lift Stay Motion should
20 be extended to match the deadline provided to the Debtors and official creditors’ committees.

21 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
22 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
23 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
24 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
25 **THAT:**

26 1. The time for the Ad Hoc Subrogation Group to file and serve any response or
27 opposition to the Lift Stay Motion is extended through 4:00 p.m. (Pacific Time) on June 20, 2019.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: June 4, 2019

Manuel Corrales, Jr.

/s/ Manuel Corrales, Jr.

Manuel Corrales, Jr.

Attorneys for the Zelmers

Dated: June 4, 2019

DIEMER & WEI LLP

/s/ Kathryn S. Diemer

Kathryn S. Diemer

*Attorneys for Ad Hoc Group of Subrogation
Claim Holders*